

REMARKS

This Amendment is being filed in response to the Office Action mailed April 17, 2009. Reconsideration and allowance of the application in view of the remarks to follow are respectfully requested.

Claims 1-9 and 12-14 are pending in the Application.

Claims 1-3, 5-6, 8-9, 12 and 14 are rejected under 35 U.S.C. §103(a) over WIPO Patent Publication No. WO 2000/062503 to Hardjono ("Hardjono") in view of European Patent Application No. EP 1032178 to Chen ("Chen"). Claims 4 and 13 are rejected under 35 U.S.C. §103(a) over Hardjono in view of Chen in further view of U.S. Patent Publication No. 2002/0078353 to Sandhu ("Sandhu"). Claim 7 is rejected under 35 U.S.C. §103(a) over Hardjono. The rejection of claims 1-9 and 12-14 is respectfully traversed. It is respectfully submitted that claims 1-9 and 12-14 are allowable over Hardjono alone and in view of any combination of Chen and Sandhu for at least the following reasons.

It is respectfully submitted that Hardjono has little to do with the presented claimed subject matter. Hardjono shows a multicast message system wherein each router shares a cryptographic key which is utilized to indicate a multicast message. Each router

is trusted with this key thereby, creating a group of trusted routers. (See, page 3, lines 12-22 and page 9, lines 11-15.) Conversely, the present system is directed to a router wherein (emphasis added) "only the members of G [the group] (but not the router device) can read the message" (see, present application, page 1, line 27), as similarly recited in the claims.

In the present system, although the routers are intended intermediaries of the message, the routers are not part of the trusted group, which is in sharp contrast with Hardjono wherein the trusted group is made up of the trusted routers.

The Office Action cites Sandhu as showing that it is common that a cryptographic key is not shared with an eavesdropper (see, Office Action, page 5). Apparently, the Office Action is equating an "eavesdropper" to a "router" as recited in the present claims.

It is respectfully submitted that the teachings of Sandhu have no relevance to the claims of the present system.

It is respectfully submitted that an eavesdropper, such as shown in Sandhu, is not an intended intermediary of the message as the "router" of the present system. In fact, cryptographically speaking, an eavesdropper is a party that monitors transmissions but certainly is not, an intended intermediary of the message.

It is respectfully submitted that the method of claim 1 is not anticipated or made obvious by the teachings of Hardjono alone and in view of any combination of Chen and Sandhu. For example, Hardjono alone and in view of any combination of Chen and Sandhu does not teach, disclose or suggest, a method that amongst other patentable elements, comprises (illustrative emphasis added) "a sender device adding a cryptographic message integrity code forming a protected communication fragment to protect at least part of the communication fragment, wherein the cryptographic message integrity code is at least partly based on the target group address; the sender device transmitting the protected communication fragment to at least one receiver device through use of a router device that is not part of a trusted group to which the sender device and the at least one receiver device belong; the router device, for the at least one receiver device referred to in the target group address, replacing the target group address with an address of the at least one receiver device forming a modified protected communication fragment, while maintaining the unchanged cryptograph message integrity code, and subsequently forwarding the modified protected communication fragment to the at least one receiver device; the at least one receiver device receiving the modified

protected communication fragment; and the at least one receiver device restoring the original protected communication fragment by replacing the address of the at least one receiver device with the target group address to allow verification of the protected communication fragment using the message integrity code" as recited in claim 1, and as similarly recited in each of claims 7-9. Chen is introduced for allegedly showing other elements of the claims and as such, does nothing to cure the deficiencies in each of Hardjono and Sandhu.

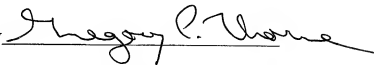
Based on the foregoing, the Applicant respectfully submits that independent claims 1, 7, 8 and 9 are patentable over Hardjono alone and in view of Chen and Sandhu and notice to this effect is earnestly solicited. Claims 2-6 and 12-14, respectively, depend from one of claims 1 and 9 and accordingly are allowable for at least this reason as well as for the separately patentable elements contained in each of the claims. Accordingly, separate consideration of each of the dependent claims is respectfully requested.

In addition, Applicant denies any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of

argument not addressed would appear to be moot in view of the presented remarks. However, the Applicant reserves the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

Applicant has made a diligent and sincere effort to place this application in condition for immediate allowance and notice to this effect is earnestly solicited.

Respectfully submitted,

By 

Gregory L. Thorne, Reg. 39,398
Attorney for Applicant(s)
July 17, 2009

THORNE & HALAJIAN, LLP
Applied Technology Center
111 West Main Street
Bay Shore, NY 11706
Tel: (631) 665-5139
Fax: (631) 665-5101

Please direct all inquiries and correspondence to:

Michael E. Belk, Reg. 33,357
Philips Intellectual Property & Standards
P.O. Box 3001
Briarcliff Manor, NY 10510-8001
(914) 333-9643